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Attorney for Defendant
DAVID HANSEN

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DAVID KENNETH HANSEN,

Defendant.

Case No.: 2:20-cr-021 TLN

STIPULATION AND ORDER
CONTINUING STATUS CONFERENCE
AND EXCLUDING TIME UNDER THE
SPEEDY TRIAL ACT

Date: March 17, 2022
Time: 9:30 a.m.
Court: Hon. Troy L. Nunley

Plaintiff United States of America by and through Assistant United States Attorney James Conolly, and Attorney Todd Leras on behalf of Defendant David Hansen, stipulate as follows:

1. This matter is presently set for a status conference on March 17, 2022. By this stipulation, Defendant Hansen moves to continue the status conference to April 28, 2022.

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2. This case involves drug trafficking and firearm charges stemming from execution of search warrants in Sacramento and Placer Counties.
3. The government has provided defense counsel with discovery consisting of written offense reports and audio recordings. Defense counsel has requested the government produce supplemental discovery materials. The defense has also shared with the government defense investigation materials as the basis for facilitating settlement discussions. The government has indicated that it now possesses some of the items requested by the defense as supplemental investigation. These items need to be reformatted prior to release to the defense to allow access to them.
4. The defense is continuing with its own investigation in this matter while settlement discussions proceed between the parties. Defense counsel requires time to conduct this investigation and anticipates that follow up defense investigation will be required based on production of the supplemental discovery materials. Additional time will also be needed to review the anticipated supplemental discovery materials and any defense investigation results with Mr. Hansen.
5. Some of the relevant events in this case occurred near Auburn, California, approximately 35 miles northeast of downtown Sacramento. The defense therefore requests additional time to perform its investigation in the Auburn area.
6. Given the ongoing defense investigation, Defendant Hansen requests to continue the status conference in this matter to April 28, 2022, at 9:30 a.m., and to exclude time between March 17, 2022, and April 28, 2022, inclusive, under Local Code T-4. The United States does not oppose this request.

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- 1 7. Attorney Todd Leras represents and believes that failure to grant additional time as
2 requested would deny Defendant Hansen the reasonable time necessary for effective
3 preparation, considering the exercise of due diligence.
4
- 5 8. For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, *et*
6 *seq.*, within which trial must commence, the time period of March 17, 2022 to April
7 28, 2022, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), and
8 (B) (iv) [Local Code T-4] because it results from a continuance granted by the Court
9 at Defendant Hansen's request on the basis that the ends of justice served by taking
10 such action outweigh the best interest of the public and the Defendant in a speedy
11 trial.
12
- 13 9. Nothing in this stipulation and order shall preclude a finding that other provisions of
14 the Speedy Trial Act dictate that additional time periods are excludable from the
15 period within which a trial must commence.
16

17 Assistant U.S. Attorney James Conolly has reviewed this proposed order and authorized
18 Todd Leras via email to sign it on his behalf.
19

20 DATED: March 14, 2022

PHILLIP A. TALBERT
United States Attorney

21 By /s/ Todd D. Leras for
22 JAMES CONOLLY
23 Assistant United States Attorney

24 DATED: March 14, 2022

25 By /s/ Todd D. Leras
26 TODD D. LERAS
27 Attorney for Defendant
28 DAVID HANSEN

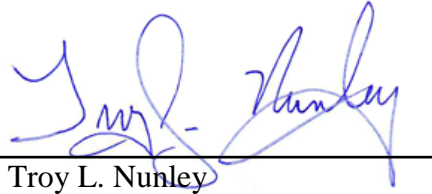
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ORDER

BASED ON THE REPRESENTATIONS AND STIPULATION OF THE PARTIES, it is hereby ordered that the status conference in this matter, scheduled for March 17, 2022, is vacated. A new status conference is scheduled for April 28, 2022, at 9:30 a.m. The Court further finds, based on the representations of the parties and Defendant Hansen's request, that the ends of justice served by granting the continuance outweigh the best interests of the public and the Defendant in a speedy trial. Time shall be excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(B)(iv) and Local Code T-4, to allow necessary attorney preparation taking into consideration the exercise of due diligence for the period from March 17, 2022, up to and including April 28, 2022.

IT IS SO ORDERED.

DATED: March 15, 2022


Troy L. Nunley
United States District Judge

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